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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JIANGXI PANDA FIREWORKS CO., LTD, a
Chinese entity;

Plaintiff,

v.

DOUGLAS BURDA, an individual;
KONCEPT LLC, a Nevada limited liability
company doing business as BURDA IP;
ELISSA BURDA, an individual, RED APPLE
FIREWORKS CO., LTD., a Nevada limited
liability company; 1.4G HOLDINGS, LLC, a
Nevada limited liability company,

Defendants.

Case No.: 2:23-cv-01232-MMD-DJA

**STIPULATION FOR STAY OF
DISCOVERY AND DISCOVERY-
RELATED MOTIONS PENDING
ADJUDICATION OF DEFENDANTS'
MOTION TO COMPEL ARBITRATION
(ECF NO. 62)**

Plaintiff Jiangxi Panda Fireworks Co., Ltd. ("Plaintiff"), by and through its counsel Bayramoglu Law Offices LLC, and Defendants Douglas Burda, Koncept LLC, Elissa Burda, Red Apple Fireworks Co., Ltd., and 1.4g Holdings, LLC ("1.4g"; collectively "Defendants"), by and through their counsel Gibson Lexbury LLP, hereby stipulate to stay all discovery and discovery-related motions pending this Court's decision on Defendants' Motion to Compel Arbitration (ECF No. 62), including, without limitation, Plaintiff's Emergency Motion for Protective Order (ECF No. 54) and Defendant 1.4g's Motion to Compel Plaintiff's Responses to

Defendant 1.4g's First Set of Interrogatories (ECF No. 55).

Respectfully submitted this 20th day of March, 2024.

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/s/ J.D. Lowry

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Having reviewed the parties' stipulation (ECF No. 63), the Court notes that the parties have not cited the standard this Court employs in determining requests to stay discovery. *See Gibson v. MGM International*, No. 2:23-cv-00140-MMD-DJA, 2023 WL 4455726 (D. Nev. July 11, 2023). Nonetheless, given the parties agreement, the reasons set forth for that agreement, and the considerations of Federal Rule of Civil Procedure 1, the Court finds good cause to stay discovery.

IT IS THEREFORE ORDERED that the stipulation to stay discovery (ECF No. 63) is **granted**.

IT IS FURTHER ORDERED that the hearing set for April 1, 2024 at 1:30 PM is **VACATED**.

IT IS FURTHER ORDERED that the two pending discovery motions (ECF Nos. 54 and 55) are **denied without prejudice and with leave to re-file** after the Court issues its decision on the motion to compel arbitration (ECF No. 62).

IT IS FURTHER ORDERED that, in the event this action continues in this Court after decision on the motion to compel arbitration, the parties must file a stipulation regarding discovery deadlines within **fourteen days** from the date of that decision.

DATED: 3/22/2024


DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE